

Exhibit 1 to the Shikman Declaration: Sealing Requests

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
<u>Joint Proffer & Supporting Exhibits</u>				
1	Exhibit A – Joint Proffer	Page 5:13-16 (between "Platforms & Ecosystems) that" and "Exs. 13-25")	This text contains non-public and confidential information regarding an internal assessment of Google Play's business model and its impact on other parts of the business. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be used by Google's competitors against it competitively.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
2	Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	Page 126, Lines 12-16 (between "on June 7th about" and "and the Play Store")	This text includes confidential and non-public information about Google's business partners and implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners with respect to the Play Store. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings with it.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
3	Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	Page 128, lines 8-10 (between "Play Store that" and "rev share on the Play Store"), and lines 20-21 (between "chat yesterday that" and "on the Play Store")	This text includes confidential and non-public information about Google's business partners and terms of their business dealings and negotiations with Google. This information thus implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners with respect to the Play Store. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings and business term communications.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
4	Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	Page 129, lines 17-23 (between "says that" and end of sentence; between "that means that" and "in return for"; and between "in return for" and "is that what that means?")	This text includes confidential and non-public information about Google's business partners and terms of their business dealings and negotiations with Google. This information thus implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners with respect to the Play Store. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings and business term communications.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
5	Exhibit A2 – Joint Proffer – Exhibit 8 [Dkt. No. 257-09]	Page 396 (between "Do you know who" and "is"; between "is?" and "is an executive at"; between "is an executive at" and "in their mobile division."; between "messed over Google Chats with" and "A. Yes."; and between "believe it is in a conversation you had with" and "and in this message it says")	This text includes confidential and non-public information about Google's business partners and implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings with it.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
6	Exhibit A3 – Joint Proffer – Exhibit 9 [Dkt. No. 257-10]	Page 369, Line 7 (between "discussing your relationship and discussions with" and "correct?")	This text includes confidential and non-public information about Google's business partners and terms of their business dealings with Google. This information thus implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners with respect to particular agreements. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings and contractual arrangements.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
7	Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 1 (between "Liderman [" and "];" and between "Kleidermacher [" and "])	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
8	Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29 08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and of app security. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. The information also reflects non-public and confidential information about the share of Android devices with malware. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
9	Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 2 (between "malware rates" and "could help sway"; and between "going to say that" and "Eugene Liderman")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and of app security. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. The information also reflects non-public and confidential information about the share of Android devices with malware. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
10	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "Wojcicki[" and "]); and between "Lockheimer [" and "])")	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
11	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1, (between "process was subverted" and "Susan Wojcicki, 2020-06-22 17:48:01"; and between "2020-06-22 17:48:46" and "Susan Wojcicki, 2020-06-22 17:55:52)	This text contains non-public and confidential information regarding an internal assessment of Google Play's business model and its impact on other parts of the business. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be used by Google's competitors against it to gain an unfair competitive advantage as to various Google business units. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
12	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "who I did say I would get back to" and "I emailed him saying")	This text refers to a third party's medical information. The third party is not a party to this litigation and has a reasonable expectation that their medical information will not be disclosed. This information accordingly should be redacted to protect that third party's privacy. This information, moreover, is not relevant to this Motion.	Plaintiffs do not oppose sealing this information.
13	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "2020-06-22 21:10:32" and end of page)	This text contains non-public and confidential information regarding an internal assessment of Google Play's business model and its impact on other parts of the business. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be used by Google's competitors against it to gain an unfair competitive advantage as to	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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			various Google business units. This information, moreover, is not relevant to this Motion.	
14	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 2 (between "allowed to take off 2 days" and "Susan Wojcicki, 2020-06-22 21 :11 :37"; and between "when did anyone say Scott can't" and "Susan Wojcicki, 2020-06-22 21 :11 : 55")	This text refers to a third party's medical information. The third party is not a party to this litigation and has a reasonable expectation that their medical information will not be disclosed. This information accordingly should be redacted to protect that third party's privacy. This information, moreover, is not relevant to this Motion.	Plaintiffs do not oppose sealing this information.
15	Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 3 (between "you and I never met and" and "Susan Wojcicki, 2020-06-22 21:14:55," between "what may be lost here" and "Susan Wojcicki, 2020-06-22 21:15:09"; between "do with our HC" and " Susan Wojcicki, 2020-06-22 21:21:11"; between "BTW" and "I'm fully aware of that"; between "keep in mind" and " Anyway, let's discuss"; and between "I understand if" and "Susan Wojcicki, 2020-06-22 21:24:20")	This text contains non-public and confidential information regarding an internal assessment of Google Play's business model and its impact on other parts of the business. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be used by Google's competitors against it to gain an unfair competitive advantage as to various Google business units. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
16	Exhibit A6 – Joint Proffer – Exhibit 13 [Dkt. No. 257-14]	Page 1 (between "Borchers[" and "];" and between "Rosenberg [" and "])	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
17	Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "Lim [" and "];" and between "Kochikar[" and end of "To:" list)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.

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18	Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "reflect the" and "convo we just had"; between "engage with" and " "; between "to your proposal" and "for reference, I think this"; between "made it unclear if" and " " between "what this means for" and end of sentence; and between "the intent is that" and end of sentence; between "4." and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
19	Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "lgm. With one caveat" and end of following sentence).	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
20	Exhibit A8 – Joint Proffer – Exhibit 15 [Dkt. No. 257-16]	Page 1 (between "Gambhir[" and "]); and between "Marchak [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
21	Exhibit A9 – Joint Proffer – Exhibit 16 [Dkt. No. 257-17]	Page 1 (between "Kolotouros[" and "]); and between "Kan[" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.

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22	Exhibit A10 – Joint Proffer – Exhibit 17 [Dkt. No. 257-18]	Page 1 (between "Kim [" and "]""); and between "Pimplapure [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
23	Exhibit A11 – Joint Proffer – Exhibit 18 [Dkt. No. 257-19]	Page 1 (between "Herring[" and "]""); and between "Porat [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
24	Exhibit A11 – Joint Proffer – Exhibit 18 [Dkt. No. 257-19]	Page 1 (between 11:06:49 and end of message; between 11:07:50 and "Ruth Porat, 2019-06-20 11:12:49"; and between "materializing" and "Ruth Porat, 2019-06-20 11:15:00")	This text reflects Google's non-public, competitively sensitive, and fairly current internal information, including detailed analysis about Google Play's business strategy and priorities. If disclosed, this information could cause competitive harm by giving competitors and other parties detailed knowledge about Google's business strategy, and competitors and other parties could adjust their own business models and priorities as a result. The text also contains sensitive, confidential data about Google's app performance that competitors could use against Google in negotiations.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
25	Exhibit A12 – Joint Proffer – Exhibit 19 [Dkt. No. 257-20]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
26	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
27	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 1 (between "2020-06-18T18:17:14.646Z" and "has reduced their"; between "marketing of the" and "limiting it"; between "if we think" and "would go bigger"; and between "exploring with them if" and "is interested")	This text describes Google's internal, confidential, and current non-public thinking regarding its business strategy and its relationship with business partners. The text also evaluates various strategies and business moves of those partners and Google's internal assessment of the impact on Google and the relationship. The text also reveals those partners' names. If publicly revealed, this information could allow Google's competitors to alter their strategies and business models in order to gain an unfair advantage against it, as well as	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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			give business partners information they could unfairly leverage in negotiations with Google. This information, moreover, is not relevant to this Motion.	
28	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 2 (between "is mostly about" and "2020-06-18T18:35:54.625Z"; "OK to leave" and "out of the agreement")	This text describes Google's internal, confidential, and current non-public thinking regarding its business strategy and its relationship with business partners. The text also evaluates various strategies and business moves of those partners and Google's internal assessment of the impact on Google and the relationship. The text also reveals those partners' names. If publicly revealed, this information could allow Google's competitors to alter their strategies and business models in order to gain an unfair advantage against it, as well as give business partners information they could unfairly leverage in negotiations with Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
29	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 2 (between "why is this just an issue for" and "2020-06-18T18:55:28.961Z"; between "FWIW" and "is also substantially"; "2020-06-18T18:58:08.881Z" and "solution has revenue"; and between "2020-06-18T19:15:07.155Z" and "2020-06-18T19:19:27.459Z")	This text describes Google's internal, confidential, and current non-public thinking regarding its business strategy and its relationship with business partners. The text also evaluates various strategies and business moves of those partners and Google's internal assessment of the impact on Google and the relationship. The text also reveals those partners' names. If publicly revealed, this information could allow Google's competitors to alter their strategies and business models in order to gain an unfair advantage against it, as well as give business partners information they could unfairly leverage in negotiations with Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
30	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 3 (between "we can partner. Since" and "we've floated 3"; between "joint meeting with" and "but we've landed nowhere"; between "differentiation to" and "is going to be"; between "coming in asking for" and "2020-06-18T20:12:57.887Z"; and between "100 people to go	This text describes Google's internal, confidential, and current non-public thinking regarding its business strategy and its relationship with business partners. The text also evaluates various strategies and business moves of those partners and Google's internal assessment of the impact on Google and the relationship. The text also reveals those partners' names. If publicly revealed, this information could allow Google's competitors to alter their strategies and business models in order to gain an unfair advantage against it, as well as give business partners information they could unfairly leverage in negotiations with Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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		to" and "2020-06-18T21:48:38.739Z")		
31	Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 4 (between "how much influence" and "has on the decisionmaking"; between "challenge esp with" and "it is not an equal playing field"; between "support provided by" and "This combined"; and between "leading to a" and "I will ping you").	This text describes Google's internal, confidential, and current non-public thinking regarding its business strategy and its relationship with business partners. The text also evaluates various strategies and business moves of those partners and Google's internal assessment of the impact on Google and the relationship. The text also reveals those partners' names. If publicly revealed, this information could allow Google's competitors to alter their strategies and business models in order to gain an unfair advantage against it, as well as give business partners information they could unfairly leverage in negotiations with Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
32	Exhibit A14 – Joint Proffer – Exhibit 21 [Dkt. No. 257-22]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
33	Exhibit A15 – Joint Proffer – Exhibit 22 [Dkt. No. 257-23]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
34	Exhibit A16 – Joint Proffer – Exhibit 23 [Dkt. No. 257-24]	Page 1 (between "Chu [" and "]); and between "Gupta [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
35	Exhibit A16 – Joint Proffer – Exhibit 23 [Dkt. No. 257-24]	Page 2 (between "this is all about" and "They could have"; between "same category as" and "They worry"; between "that if they" and "Eric Chu, 2020-05-28	This text contains non-public and confidential information regarding an internal assessment of Google Play's business model and its impact on other parts of the business. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be used by Google's	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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		11:57:19"; between "protecting" and Prachi Gupta, 2020-05-28 11:58:18"; between "regarding" and "i don't see"; and between "world where we" to "Eric Chu, 2020-05-28 12: 05: 22")	competitors against it to gain an unfair competitive advantage as to various Google business units.	
36	Exhibit A17 – Joint Proffer – Exhibit 24 [Dkt. No. 257-25]	Page 1 (between "Kolotouros [" and "]""); and between "Indonie [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
37	Exhibit A18 – Joint Proffer – Exhibit 25 [Dkt. No. 257-26]	Page 1 (between "Lee [" and "]""); and between "To:" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
38	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 4, fourth section (between beginning of bolded header and "Contracts"; between "agreements between" and ", because the individuals"; between "responsible for negotiating the" and "are custodians in either"; between "relating to" and "agreements that were collected"; and between "agreements between" and ". Google also reserves")	This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
39	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 4, heading 5 (from beginning of heading to "Agreement").	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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			in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	
40	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 5 (from "example of an email referencing a" to "NDA")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
41	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 6, para. 4 (between "signing party for" and "agreements is"; between "agreements is" and end of sentence; and between "has been produced for" and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
42	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 7, paragraph 1 (between "(1)" and "(GOOG-"; between "(2)" and "(GOOG-"; between "(3)" and	This text reflects the identity of non-party developers and the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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		"(GOOG-"; and between "(4)" and "(GOOG-")	example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings. This information, moreover, is not relevant to this Motion.	
43	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Ex. C, Entire Table	This table lists the names of non-party developers and reflects the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
44	Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Ex. D, Entire Table	This table lists the names of non-party developers and reflects the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
45	Exhibit A20 – Joint Proffer – Exhibit 31 [Dkt. No. 257-31]	Page 1 (between "Herring [" and "]; and between "Cramer [" and "])	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
46	Exhibit A20 – Joint Proffer – Exhibit 31 [Dkt. No. 257-31]	Page 1 (between "in Q2 alone" and "see earnings prep")	This texts reveals non-public information regarding revenue and revenue growth figures for Google Play. Google does not publicly break out its revenues or profits for Google Play as it is revealed in	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

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			this statement, as such disclosures would reveal important and confidential information to competitors and counterparties regarding Google Play. This information has never been disclosed publicly, and disclosure would severely and adversely impact Google's ability to negotiate agreements in the future. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations. For example, if a potential counterparty were to have visibility into the strength, or weakness, of Google Play, it could use that information as leverage in negotiations with Google and with Google's competitors. In addition, material, non-public, sensitive financial information may not be (and need not be) consistent with generally accepted accounting principles or Google's public financial filings. Therefore, revealing this revenue and profit data publicly can be misleading for investors and other parties and lead to inappropriate inferences to the performance of this and other parts of Google's business.	
47	Exhibit A21 – Joint Proffer – Exhibit 32 [Dkt. No. 257-32]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
48	Exhibit A21 – Joint Proffer – Exhibit 32 [Dkt. No. 257-32]	Page 1 (between "is about" and "https:screenshot"; between "we do about" and "disables"; and between "disables and" and "warnings depending).	This text reflects Google's non-public, competitively sensitive, and current internal information about the number and percentage of warnings versus disables. Disclosure of that information could harm Google competitively by allowing competitors to use this information to alter their business strategies, and allow developers to also alter their business strategies in light of these figures. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
49	Exhibit A22 – Joint Proffer – Exhibit 33 [Dkt. No. 257-33]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
50	Exhibit A23 – Joint Proffer – Exhibit 34 [Dkt. No. 257-34]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
51	Exhibit A23 – Joint Proffer – Exhibit 34 [Dkt. No. 257-34]	Page 1-2 (between "2021-02-01T19:18:14.132-06:00" and "2021-02-01T19:18:23.899-06:00"; between "did you hear that on" and "No I actually use Android,"; and between "10pm on" and "with elon musk.")	This text includes confidential and non-public information about developers who partner with Google. Specifically, the text reveals details about a developer's requests and strategy around their app and their negotiations with Google around that strategy. This information thus implicates non-parties' confidentiality interests, by revealing the identities of Google's business partners with respect to the Play Store and the details of their business strategies. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings and business communications. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
52	Exhibit A24 – Joint Proffer – Exhibit 35 [Dkt. No. 257-35]	Page 1 (between "Liderman [" and "]); and between "Kleidermacher [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
53	Exhibit A24 – Joint Proffer – Exhibit 35 [Dkt. No. 257-35]	Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29 08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and of app security. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. The information also reflects non-public and confidential information about the share of Android devices with malware. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
54	Exhibit A25 – Joint Proffer – Exhibit 36 [Dkt. No. 257-36]	Page 1 (between "Izmit [" and "]); and between "Bankhead [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
<u>Plaintiffs' Motion for Sanctions</u>				
55	Exhibit B – Plaintiffs' Motion for Sanctions [Dkt. No. 349]	Page 3, lines 10-11 (between "including" and ", about relevant matters")	This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
56	Exhibit B – Plaintiffs' Motion for Sanctions [Dkt. No. 349]	Page 9, lines 9-14 (between "popular apps" and ", YouTube)"; between "warns" and "Engineering"; and between "that" and end of sentence)	This text contains non-public information regarding confidential business strategies within Google. This information has never been disclosed publicly, and disclosure would severely and adversely impact Google's ability to negotiate agreements with third parties in the future. If revealed to competitors and potential business counterparties, they could use this non public and confidential information to disadvantage Google in marketing and in negotiations. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
57	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 4, fourth section (between beginning of bolded header and "Contracts"; between "agreements between" and ", because the individuals"; between "responsible for negotiating the" and "are custodians in either"; between "relating to" and "agreements that were collected"; and between "agreements between" and ". Google also reserves")	This text contains confidential, non-public information regarding Google's agreements with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
58	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 4, heading 5 (from beginning of heading to "Agreement")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
59	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 5 (from "example of an email referencing a" to "NDA")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
60	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 6, para. 4 (between "signing party for" and "agreements is"; between "agreements is" and end of sentence; and between "has been produced for" and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.	
61	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 7, paragraph 1 (between "(1)" and "(GOOG-"; between "(2)" and "(GOOG-"; between "(3)" and "(GOOG-"; and between "(4)" and "(GOOG-")	This text reflects the identity of non-party developers and the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
62	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Ex. 01-C, Entire Table	This table lists the names of non-party developers and reflects the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
63	Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Ex. 01-D, Entire Table	This table lists the names of non-party developers and reflects the existence of confidential commercial agreements with those developers. Public disclosure of this information could cause competitive harm to both those non-parties and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-parties, disclosure of their non-public, confidential agreements with Google could negatively affect their relationship with Google and future business dealings.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
64	Exhibit B2 –	Page 128, lines 8-10 (between "Play Store that" and "rev share on the Play Store"), and	This text includes confidential and non-public information about Google's business partners and terms of their business dealings and negotiations with Google. This information thus implicates non-	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
	Plaintiffs' Motion for Sanctions – Exhibit 3 [Dkt. No. 349-2]	lines 20-21 (between "chat yesterday that" and "on the Play Store")	parties' confidentiality interests, by revealing the identities of Google's business partners with respect to the Play Store. Those business partners are not parties to this litigation and have a reasonable expectation that Google will maintain the confidentiality of their dealings and business term communications.	
65	Exhibit B2 – Plaintiffs' Motion for Sanctions – Exhibit 3 [Dkt. No. 349-2]	Page 129, lines 17-23 (between "says that" and end of sentence; between "that means that" and "in return for"; and between "in return for" and "is that what that means?")	This text reflects the identity of a non-party developer, the substance of commercially sensitive discussions relating to that developer's business strategy, discussion of a confidential commercial agreement with that developer, and specific deal terms and financial considerations associated with those negotiations. Public disclosure of this information could cause competitive harm to both this non-party and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-party, disclosure of their non-public, confidential discussions with Google could negatively affect their relationship with Google and future business dealings.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
66	Exhibit B3 – Plaintiffs' Motion for Sanctions – Exhibit 6 [Dkt. No. 349-2]	Page 11, lines 12-20 (between "Q" and end of sentence ending at line 20)	The identified text identifies the home address of a current Google employee, and no public interest is served by the public disclosure of this sensitive, personal information. This employee has a reasonable expectation of privacy that would be infringed upon if this information were to be made public. This information, moreover, is not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing the information found in lines 15-20, but oppose sealing the information found in lines 12-14.
67	Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 1 (between "Herring [" and "];" and between "Cramer [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
68	Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 1 (between "in Q2 alone" and "see earnings prep")	This texts reveals non-public information regarding revenue and revenue growth figures for Google Play. Google does not publicly break out its revenues or profits for Google Play as it is revealed in this statement, as such disclosures would reveal important and confidential information to competitors and counterparties regarding Google Play. This information has never been disclosed publicly, and disclosure would severely and adversely impact Google's ability to negotiate agreements in the future. If revealed to competitors and	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations. For example, if a potential counterparty were to have visibility into the strength, or weakness, of Google Play, it could use that information as leverage in negotiations with Google and with Google's competitors. In addition, material, non-public, sensitive financial information may not be (and need not be) consistent with generally accepted accounting principles or Google's public financial filings. Therefore, revealing this revenue and profit data publicly can be misleading for investors and other parties and lead to inappropriate inferences to the performance of this and other parts of Google's business.	
69	Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 2 (between "in this chart" and end of sentence; and between "but this is the number from BC and" and end of sentence)	This text reflects specific financial terms considered, and discussed, in relation to a confidential agreement with a third-party developer. Public disclosure of this information could cause competitive harm to both this non-party and to Google. For example, Google's competitors could use this information in their own commercial negotiations to obtain a competitive advantage against Google with respect to deal terms. With respect to the non-party, disclosure of their non-public, confidential discussions with Google could negatively affect their relationship with Google and future business dealings. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
70	Exhibit B5 – Plaintiffs' Motion for Sanctions – Exhibit 8 [Dkt. No. 349-2]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
71	Exhibit B6 – Plaintiffs' Motion for Sanctions – Exhibit 9 [Dkt. No. 349-2]	Page 1 (between "Izmit [" and "]""); and between "Bankhead [" and end of "To:" line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
72	Exhibit B7 –	Page 1 (between "Pimplapure [" and "]""); and between	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
	Plaintiffs' Motion for Sanctions – Exhibit 10 [Dkt. No. 349-2]	"Song [" and end of "To:" line)		
73	Exhibit B8 – Plaintiffs' Motion for Sanctions – Exhibit 12 [Dkt. No. 349-2]	Page 1 (between "Liderman [" and "]; and between "Kleidermacher [" and "])	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
74	Exhibit B8 – Plaintiffs' Motion for Sanctions – Exhibit 12 [Dkt. No. 349-2]	Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29 08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and of app security. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. The information also reflects non-public and confidential information about the share of Android devices with malware. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
75	Exhibit B9 – Plaintiffs' Motion for Sanctions – Exhibit 13 [Dkt. No. 349-2]	Page 1 (between "Chu [" and end of "From:" line; between "To:" and end of line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
76	Exhibit B9 – Plaintiffs' Motion for Sanctions – Exhibit 13 [Dkt. No. 349-2]	Page 2 (between "12:24:38" and end of message; between "12:24:49" and end of message; between "13:34:23" and end of message; and between "13:34:40" and end of message)	This information contains non-public information regarding Play costs. This information has never been disclosed publicly, and disclosure would severely and adversely impact Google's ability to negotiate agreements in the future. If revealed to competitors and potential business counterparties, they could use this non-public and confidential information to disadvantage Google in marketing and in negotiations. For example, a potential counterparty armed with this non-public information could use it to obtain leverage against Google in negotiations by pointing to this Play cost information. In addition, material, non-public, sensitive financial information may not be (and need not be) consistent with generally accepted accounting principles or Google's public financial filings.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			Therefore, revealing this Play cost data publicly can be misleading for investors and other parties and lead to inappropriate inferences to the performance of this and other parts of Google's business. This information, moreover, is not relevant to this Motion.	
77	Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "Lim [" and end of "From:" line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
78	Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "reflect the" and "convo we just had"; between "engage with" and " "; between "to your proposal" and "for reference, I think this"; between "made it unclear if" and " "; between "what this means for" and end of sentence; between "the intent is that" and end of sentence; and between "4." and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. This information, moreover, is not relevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
79	Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "lgtn. With one caveat" and end of following sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			competitors could use this non-party information to unfairly target Google's developer partners.	
80	Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 1 (between "Schaengold [:" and end of line; between "To:" and end of line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
81	Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 2 (between "directly to reflect the details of" and end of message; between "images of the" and "flow?"; between "we should include" and end of message; between "17:02:00" and "<ahref="; between "Thanks for pointing that out, Christina" and end of message; and between "18:01:03" and end of message)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
82	Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 3 (between "18:03:55" and end of message at end of page)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
83	Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 4 (between "18:08:13" and Mrinalini Loew, 2021-05-26 18:11:38")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners. Finally, this passage includes reference to a Google employee's family that is irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
84	Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Pages 4-5 (between "18:13:03" and "18:23:48")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals Google's internal strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
85	Exhibit B12 – Plaintiffs' Motion for Sanctions – Exhibit 16 [Dkt. No. 349-2]	Page 1 (between "Mahbod [:]" and end of line; between "To:" and end of line)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
86	Exhibit B12 –	Page 1 (between "08:48:37" and end of message beginning "08:48:39")	This text reveals specific details about Google's ongoing projects and strategy in connection with specific Google commercial programs. Public disclosure could cause harm to Google's competitive standing by giving competitors and others insights into	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
	Plaintiffs' Motion for Sanctions – Exhibit 16 [Dkt. No. 349-2]		Google's business strategies and allowing them to alter their business tactics accordingly.	
87	Exhibit B13 – Plaintiffs' Motion for Sanctions – Exhibit 17 [Dkt. No. 349-2]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
88	Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	Page 3 (between "Agreement with" and end of heading; between "We understand that the" and end of sentence; and between "do not understand how" and "avoidance of lodging")	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of confidential negotiations. Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
89	Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	Page 6 (between "As for agreements with" and ", as discussed"; between "meet and confer," and "Plaintiffs previously"; between "does it appear that" and "is a part of any"; between "the issue of" and "agreements, claiming that public news reports"; between "exist relevant agreements with" and "yet Plaintiffs"; and between "relating to advertising" and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of confidential negotiations. Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
90	Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	Page 6 (between "Agreement related to" and end of heading; between "its agreement with" and "is irrelevant and simply"; between "working through	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of confidential	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
		these issues with" and end of sentence; and between "work through the specific with" and "regarding this potential compromise")	negotiations. Google's competitors could use this non-party information to unfairly target Google's developer partners.	
91	Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	Page 6 (between "relevant communications with Apple," and end of following sentence; and between "communications related to" and end of sentence)	This text contains confidential, non-public information regarding a non-party developer, and implicates the non-party's confidentiality interests, by revealing the identity of a Google business partner who is not party to this litigation, and who has a reasonable expectation that Google will maintain the confidentiality of confidential negotiations. Google's competitors could use this non-party information to unfairly target Google's developer partners.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
92	Exhibit B15 – Plaintiffs' Motion for Sanctions – Exhibit 20 [Dkt. No. 349-2]	Page 1 (between "Yang [" and "];" and between "Riphagen [" and end of "To:" list)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
93	Exhibit B16 – Plaintiffs' Motion for Sanctions – Exhibit 21 [Dkt. No. 349-2]	Page 1 (between "Chu [" and "];" and between "Kim [" and end of "To:" list)	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
94	Exhibit B16 – Plaintiffs' Motion for Sanctions – Exhibit 21 [Dkt. No. 349-2]	Pages 3-5 (between "has been asked by" and "We told them this is different"; between "asked to present" and "next Friday"; between "will be presenting" and end of sentence; and between "something before next friday" and "etc.")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and of its potential technical investments. This information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. The information also reflects non-public and confidential information about the share of Android devices with malware. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. This information, moreover, is not relevant to this Motion or this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
	<u>Plaintiffs' Reply</u>			
95	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 1 (between "declines" and "what is/is not")	This text describes the compensation structure for an individual Google employee or employee candidate, whom the text identifies by name. This personally identifying information is both sensitive and irrelevant to this Motion and this litigation.	Plaintiffs do not oppose sealing this information.
96	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 3 (between "comp" and "Jan1")	This text outlines the compensation structure and amount for an individual Google employee, and is irrelevant to this Motion and this litigation.	Plaintiffs do not oppose sealing this information.
97	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 4 (between "what (any) plan might look like" and "4. other random"; and between "feedback/notes" and "ok, etc?")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers and strategy for competing with Apple. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
98	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 7 (between "pb" and "runway")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers and strategy for competing with Apple. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
99	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 11 (between "billions at risk" and "https://docs.google.com/")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees. This material--which discusses individual employee performance and specific issues related to personnel management--is both personally	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			sensitive and irrelevant to this Motion and this litigation. This material, moreover, is irrelevant to this Motion.	
100	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 7 (between "jamie" and end of page).	This text contains confidential, non-public information regarding Google's internal strategy and decision-making with regard to its billing policies. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
101	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 13 (between "clover" and "store process.").	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
102	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 13 (between "step back" and "as a vector")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers and strategy for competing with Apple. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
103	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 14 (between "team off" and "carousel")	This text contains confidential, non-public information regarding Google's negotiations with non-party partners. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
104	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 15 (between "and then . . ." and end of page)	This text contains confidential, non-public information regarding Google's negotiations with non-party partners. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
105	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 16 (between "what to combine" and "sameer")	This text contains a discussion of personnel issues related to individual Google employees that the text identifies by name. This material--which discusses individual employee performance and specific issues related to personnel management--is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
106	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 17-18 (between "2/8" and "2/9")	This text contains a discussion of personnel issues related to individual Google employees that the text identifies by name. This material—which discusses individual employee performance and specific issues related to personnel management—is both personally sensitive and irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
107	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 20-21 (between "gmscore" and "timeline")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover,	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Additionally, this text describes non-public information on Google's security practices and features. Public disclosure could enable malefactors to create or exploit security risks on consumer devices. This material, moreover, is irrelevant to this Motion.	
108	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 22 (between top of page and "policy, etc}"; and between "2:40PM" and end of message)	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
109	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 23-24 (between "2:41 PM," on page 23, and "2:55 PM," on page 25)	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Additionally, this text describes non-public information on Google's security practices and features. Public disclosure could enable malefactors to create or exploit security risks on consumer devices. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
110	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 27 (between "for october" and "negotiations there"; and between "few things" and end of page)	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover,	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Additionally, this text describes non-public information on Google's security practices and features. Public disclosure could enable malefactors to create or exploit security risks on consumer devices. This material, moreover, is irrelevant to this Motion.	
111	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 28 (between "5:32 PM" and "without a hedge")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Additionally, this text describes non-public information on Google's security practices and features. Public disclosure could enable malefactors to create or exploit security risks on consumer devices. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
112	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 29 (between top of page and "abuse")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees. This material—which discusses individual employee performance and specific issues related to personnel management—is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
113	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 30 (between "2:23pm" and "our policies")	This text contains confidential, non-public information regarding Google's internal product strategies, which are relevant to discussions and deals with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
114	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 32 (between "up slightly" and "4 min"; and between "April)" and "1 min.")	This text identifies a particular Google employee by name. That identification is irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
115	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 32 (between "achieve the most" and end of page)	This text identifies particular individuals, including employees of third-party developer partners, by name. That identification is irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
116	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between top of page and "world changing")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. This material—which discusses individual employee performance and specific issues related to personnel management—is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
117	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between changing course?" and "talks to")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. This material—which discusses individual employee performance and specific issues related to personnel management—is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
118	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between "talks to" and "1) get clarity")	This text contains confidential, non-public information related to negotiations with third-party partners. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
119	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33-36 (between "analytics available" and end of page 36)	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record verbatim feedback from individual Google employees about the performance of other individual Google employees—all of whom are identified by name. This material—which discusses individual employee performance and specific issues related to personnel management—is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
120	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 37 (between "met w" and "behind on")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
121	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 37 (between "taking orders" and "GKS")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
122	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 41 (between "do with the data" and "DEI")	This text contains confidential, non-public information regarding Google's strategy for negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
123	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 41-42 (between "how this started" and "slack, etc.")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record feedback on individual Google employees' performance and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
124	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 42 (between "search" and end of page)	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record feedback on individual Google employees' performance and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
125	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 43 (between "team leadership" and "DEI"; and between "startup" and "qb for")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record feedback on individual Google employees' performance and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
126	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 43 (between "as we converged" and "real money"; and between "advisor to" and "lootdrops")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record feedback on individual Google employees' performance and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
127	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 45 (between "return to office" and "subs platform")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record feedback on individual Google employees' performance and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
128	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 46-49 (between "use facing" and "NATIVE")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record verbatim feedback collected on individual Google employees' performance, and identifies both those employees and the employees that provided the feedback by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
129	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 49-50 (between "NATIVE" and "??")	This text contains a discussion of personally identifying information related to an individual non-employee that appears to be an interview candidate or potential partner candidate. Disclosure of this personally identifying biographical and resume information would	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			violate that individual's reasonable expectation of privacy in their personal information shared privately with Google employees. This material, moreover, is irrelevant to this Motion.	
130	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 52 (between "economics?" and "role")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record verbatim feedback collected on individual Google employees' performance, and identifies both those employees and the employees that provided the feedback by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
131	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 53 (between "entertainment" and "rest of app")	This text appears to record personally identifying background information related to an individual Google employee or potential partner, each of whom would have a reasonable expectation of privacy in their negotiations with Google. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
132	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 54 (between "product objectives" and "misinformation")	This text contains confidential, non-public information regarding Google's negotiations with a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. Finally, disclosure could harm Google's ability to negotiate with third-parties who, like the developer implicated by this material, have a reasonable expectation of confidentiality in their private negotiations with Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
133	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 54 (between "zoom in here?" and "NATIVE")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, it reflects detailed feedback on identified employees' performance. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
134	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 54-55 (between "NATIVE" and "pps summaries")	This text contains a discussion of personally identifying information related to a individual non-employee that appears to be an interview candidate or potential partner candidate. Disclosure of this personally identifying biographical and resume information would violate that individual's reasonable expectation of privacy in their personal information shared privately with Google employees. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
135	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 55 (between "free2paid" and "dev console")	This text contains a discussion of confidential, internal product strategy. In particular, it contains a description of Google's specific geographic roll-out plans for a specific product. Disclosure of this private strategic information could cause Google competitive harm by alerting competitors to Google's specific launch plans for specific products. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
136	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 58-59 (between "not on slide" and "[HEARING]")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record verbatim feedback collected on individual Google employees' performance, and identifies both those employees and the employees that provided the feedback by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
137	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 62 (between "play cuts" and "quarterly")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, these pages record verbatim feedback collected on individual Google employees' performance, and identifies both those employees and the employees that provided the feedback by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
138	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 67 (between "23 min" and end of message)	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	
139	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 70 (between "he ask," and "transactional")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
140	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 70 (between " - sundar - " and "unclear plan")	This text contains confidential, non-public information regarding Google's negotiations with non-party developers. Disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's developer partners and offer specific deal terms designed to undercut those offered by Google. This material, moreover, is irrelevant to this Motion.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
141	Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 71 (between "YT" and "r&r")	This text contains a discussion of personnel issues related to individual Google teams and individual Google employees that the text identifies by name. Specifically, this material records feedback on individual Google employees' performance, and identifies those employees by name. This material is both personally sensitive and irrelevant to this Motion and this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
142	Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	Page 73, line 1 to Page 74, line 11 (from start of line 1 to end of line 11)	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and negotiating approach to third-parties. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. Specifically, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
			revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.	
143	Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	Page 75, lines 2-5 (from "Q" to end of sentence ending on line 5)	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and negotiating approach to third-parties. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. Specifically, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
144	Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	Page 75, lines 13-21 (from "Q" to end of sentence ending on line 21)	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and negotiating approach to third-parties. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. Specifically, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
145	Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	Page 76, line 11 to Page 77, line 6 (from "A" to end of sentence ending on Page 77, line 6)	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and negotiating approach to third-parties. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. Specifically, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.

	Document Name	Location of Designated Information	Google's Position in Support of Sealing	Plaintiffs' Position in Opposition of Sealing
146	Exhibit C2 – Plaintiffs' Reply Exhibit 25 [Dkt. 372-6]	Page 1 (between "Herring [" and "]; and between "Porat [" and end of "To:" line).	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
147	Exhibit C2 – Plaintiffs' Reply Exhibit 25 [Dkt. 372-6]	Page 1 (between 11:06:49 and end of message; between 11:07:50 and "Ruth Porat, 2019-06-20 11:12:49"; and between "materializing" and "Ruth Porat, 2019-06-20 11:15:00")	This text contains non-public and confidential information regarding Google Play's internal assessment of its strategic priorities and negotiating approach to third-parties. Disclosure of this information could be used by Google's competitors to inform their business strategies in a way that causes competitive harm to Google. Specifically, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
148	Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	Page 1 (between "From:" and end of line; between "To:" and end of line; and between "Subject:" and end of line).	This text contains email addresses of individual Google employees. This personally identifying information is sensitive and not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing this information.
149	Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	Page 1 (between "you are making headlines" and "The same thing happened with Java")	The identified text identifies job-search details of Google employees, and no public interest is served by the public disclosure of this sensitive, personal information. This employee has a reasonable expectation of privacy that would be infringed upon if this information were to be made public. This information, moreover, is not relevant to this Motion or this litigation.	Plaintiffs oppose sealing this information. <i>See</i> Plaintiffs' portion of joint filing.
150	Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	Page 2 (between "me" and "would work, too.")	The identified text identifies job-search details of Google employees, and no public interest is served by the public disclosure of this sensitive, personal information. This employee has a reasonable expectation of privacy that would be infringed upon if this information were to be made public. This information, moreover, is not relevant to this Motion or this litigation.	Plaintiffs do not oppose sealing the phone number found in this passage, but oppose sealing the remaining information.